### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

THOMSON REUT	ERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING		)	
CORPORATION,		)	
		)	
	Plaintiffs and	)	
	Counterdefendants,	)	
		)	
v.		)	C.A. No. 20-613 (SB)
		)	
ROSS INTELLIGENCE INC.,		)	
		)	
	Defendant and	)	
	Counterclaimant.	)	

## THOMSON REUTERS' MOTION FOR SUMMARY JUDGMENT ON ROSS'S ANTITRUST COUNTERCLAIMS (NO. 3) – STATUTE OF LIMITATIONS

Pursuant to Federal Rule of Civil Procedure 56, Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, "Thomson Reuters") respectfully move for entry of summary judgment on ROSS Intelligence Inc.'s antitrust counterclaims (Counts VI, VII, and VIII).

The grounds for this motion are set forth in Thomson Reuters' opening brief and supporting exhibits and declarations, filed concurrently. A proposed order is attached.

#### MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

Jack B. Blumenfeld (#1014) Michael J. Flynn (#5333) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899 (302) 658-9200 jblumenfeld@morrisnichols.com mflynn@morrisnichols.com

KLAND & ELLIS LLP

North LaSalle
Cago, IL 60654

Publishing Corporation

Attorneys for Plaintiffs and Counterdefendants

Thomson Reuters Enterprise Center GmbH and West

Publishing Corporation

OF COUNSEL:

Daniel E. Laytin, P.C. Christa C. Cottrell, P.C. Cameron Ginder Max A. Samels KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, IL 60654 (312) 862-2000

August 31, 2023

# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE CENTRE GMBH and WEST PUBLISHING CORPORATION,				
Plaintiffs and Counterdefendants,				
v.	C.A. No. 20-613 (SB)			
ROSS INTELLIGENCE INC.,				
Defendant and Counterclaimant.				
PROPOSED  ORDER				
This Court, having considered Thomson R	euters Enterprise Centre GmbH and West			
Publishing Corporation's (collectively, "Thomson	Reuters") Motion for Summary Judgment on			
ROSS Intelligence Inc.'s Antitrust Counterclaims	(No. 3) – Statute of Limitations and the related			
briefing and argument thereto,				
IT IS HEREBY ORDERED this day of 2023 that Thomson				
Reuters' Motion for Summary Judgment is <b>GRANTED</b> .				
Date:				
	The Honorable Stephanos Bibas			

#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2023, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on

August 31, 2023, upon the following in the manner indicated:

David E. Moore, Esquire
Bindu Palapura, Esquire
Andrew L. Brown, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801

Attorneys for Defendant and Counterclaimant

Mark A. Klapow, Esquire
Lisa Kimmel, Esquire
Crinesha B. Berry, Esquire
Matthew J. McBurney, Esquire
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Attorneys for Defendant and Counterclaimant

Gabriel M. Ramsey, Esquire
Jacob Canter, Esquire
Warrington Parker, Esquire
Margaux Poueymirou, Esquire
Anna Z. Saber, Esquire
Beatrice B. Nguyen, Esquire
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

VIA ELECTRONIC MAIL

VIA ELECTRONIC MAIL

Shira Liu, Esquire CROWELL & MORING LLP 3 Park Plaza, 20th Floor Irvine, CA 92614 Attorneys for Defendant and Counterclaimant

VIA ELECTRONIC MAIL

/s/ Michael J. Flynn

Michael J. Flynn (#5333)